BAKER & HOSTETLER LLP

45 Rockefeller Plaza

New York, NY 10111

Telephone: (212) 589-4200 Facsimile: (212) 589-4201

David J. Sheehan

Email: dsheehan@bakerlaw.com

Nicholas J. Cremona

Email: ncremona@bakerlaw.com

Dean D. Hunt

Email: dhunt@bakerlaw.com

Attorneys for Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and for the Estate of Bernard L. Madoff

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

GILBERT M. KOTZEN 1982 TRUST; MARCIA KOTZEN 2002 REVOCABLE TRUST; LINDA S. PARESKY, individually and in her capacity as Trustee for the Gilbert M. Kotzen 1982 Trust and the

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 10-04690 (SMB)

Marcia Kotzen 2002 Revocable Trust; and STEPHENY B. RIEMER, individually and in her capacity as Trustee for the Gilbert M. Kotzen 1982 Trust and the Marcia Kotzen 2002 Revocable Trust,

Defendants.

FIRST AMENDED CASE MANAGEMENT NOTICE

PLEASE TAKE NOTICE, that pursuant to the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the "Order") [Dkt. No. 3141] entered by the Bankruptcy Court in the above captioned SIPA liquidation, Adv. Pro. No. 08-01789 (SMB), on November 10, 2010, the following deadlines are hereby made applicable to this adversary proceeding:

- 1. The Initial Disclosures deadline has passed.
- 2. The Deadline for Service of Substantive Interrogatories has passed.
- 3. Fact Discovery shall be completed by: February 27, 2015.
- 4. The Disclosure of Case-in-Chief Experts shall be due: July 9, 2015.
- 5. The Disclosure of Rebuttal Experts shall be due: August 10, 2015.
- 6. The Deadline for Completion of Expert Discovery shall be: October 9, 2015.
- 7. The Deadline to File a Notice of Mediation Referral shall be: November 9, 2015.
- 8. The Deadline to Choose a Mediator and File a Notice of Mediator Selection shall be: November 23, 2015.
- 9. The Deadline for Conclusion of Mediation shall be: January 22, 2016.

Dated: New York, New York February 27, 2015

Of Counsel:

Dean D. Hunt **BAKER & HOSTETLER LLP**

811 Main, Suite 1100 Houston, Texas 77002 Telephone: 713.751.1600

Fax: 713.751.1717

Email: dhunt@bakerlaw.com

/s/ Nicholas J. Cremona

David J. Sheehan

Email: dsheehan@bakerlaw.com

Nicholas J. Cremona

Email: ncremona@bakerlaw.com BAKER & HOSTETLER LLP

45 Rockefeller Plaza

New York, New York 10111 Telephone: 212.589.4200

Fax: 212.589.4201

Attorneys for Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and the Estate of Bernard L. Madoff